

Ms. Carolyn Carlson  
DaimlerChrysler Corporation  
1817 "I" Avenue  
New Castle, IN 47362

Re: **065-14915-00001**  
Third Administrative Amendment to  
**FESOP 065-5619-00001**

Dear Ms. Carlson:

On July 9, 2001, the Office of Air Quality (OAQ) received a letter from DaimlerChrysler Corporation requesting the removal of maintenance paint booth N-26 from Section D.4 of their existing operating permit, that the maintenance paint booth be removed from Condition A.2(g), and that no material usage or emission limits be required in the FESOP. Pursuant to the provisions of 326 IAC 2-8-10 the permit is hereby administratively amended as follows:

**(a) Removal of Maintenance Paint Booth N-26 From Section D.4:**

DaimlerChrysler Corporation has requested that maintenance paint booth N-26 be removed from Section D.4 because the maintenance paint booth is "now specifically exempt from permitting requirements pursuant to 326 IAC 2-1.1-3(d)(34)(B) which was adopted subsequent to the issuance of NCMF's original FESOP", and "a specifically referenced insignificant activity".

Based on review of the state rules, the following has been determined:

- (1) The maintenance paint booth is not exempted under 326 IAC 2-1.1-3(d)(34)(B) because the booth is not used to paint the interior and exterior of building(s);
- (2) The maintenance booth is not an insignificant activity under 326 IAC 2-7-1(21) because the paint booth is not one of units or activities under paragraphs (B) through (G) of 326 IAC 2-7-1(21) and the maintenance booth worst case coating VOC potential to emit (14.92 tons/yr) exceeds the applicable 326 IAC 2-1.1-3(d) level of 10 tons per year as specified in 326 IAC 2-7-1(21)(A); and
- (3) All limits and requirements that apply to the maintenance paint booth must be identified in a representative "D" Section. 326 IAC 2-1.1-3(d) exempts new sources and modifications from the "permitting" requirements under 326 IAC 2-7-10.5 (Part 70 source modifications), 326 IAC 2-6.1-6 (Minor Source Operating Permit revisions), 326 IAC 2-7-12 (Part 70 permit modifications), and 326 IAC 2-8-11.1 (Federally Enforceable State Operating Permit revisions), but does not exempt the source from complying with any other applicable state or federal rules.

Since the maintenance paint booth is subject to the requirements of 326 IAC 8-2-9 and 326 IAC 6-3-2, all limits and compliance determination, compliance monitoring, and record keeping and reporting requirements, must be listed in a "D" Section. These requirements are listed in Section D.4. Thus, the maintenance paint booth shall not be removed from Section D.4.

**(b) Removal of Maintenance Paint Booth from Condition A.2(g):**

Upon review of Section A of the permit, it is determined that there are two locations in Section A where emission units and control devices are identified; Condition A.2, Emission Units and Pollution Control Summary, and Condition A.3, Insignificant Activities. Since the maintenance booth is determined to "not" be an insignificant activity, the maintenance booth must be placed in Condition A.2. The maintenance booth is currently identified in Condition A.2(g). Thus, no changes shall be made.

**(c) No Material Usage or Emission Limits Should Be Required in the FESOP:**

DaimlerChrysler has requested that no material usage or emission limits be required in Section D.4 of the permit.

Upon review of Section D.4 of the FESOP, the following have been determined regarding the requirements associated with the maintenance paint booth VOC limits. The only applicable VOC limit is under Condition D.4.1 which requires the owner or operator to apply coatings with a VOC content less than or equal to 3.5 pounds of VOC per gallon coating, excluding water, as applied.

There are no compliance determination or compliance monitoring requirements associated with this limit, but Condition D.4.7 requires the source to keep records of the weight of each VOC containing material, the weight percent VOC and the weight of VOCs emitted for each compliance period.

Condition D.4.7 states "the records shall be sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in the permit". As previously stated, the only VOC limit is the "emission rate" limit of Condition D.4.1. Thus, no VOC usage records are required to be kept. The only other reference to VOC usage is Paragraph (a) of Condition D.4.7 which states "The records shall contain a minimum of the following:... the weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used." This paragraph is not necessary since there are no VOC usage limits.

Therefore, Condition D.4.7 shall be amended to clarify its intent. Since the invoices and purchase orders do not establish the VOC content of the coatings "as applied", the Condition shall also be amended to require compliance demonstration utilizing the "As Supplied and "As Applied" VOC data sheets.

In addition, upon review of the PM overspray requirements, it is determined that the record keeping requirements of all inspections and observations as well as the testing requirements, were not included in the permit. Thus, Section D.4 shall be amended as follows:

## SECTION D.4 FACILITY OPERATION CONDITIONS

- (1) One (1) maintenance paint booth, capacity: one (1) unit per hour, identified as N-26, exhausting through Stack 102.
- (2) One (1) piston pin packer, capacity: 2,500 parts per hour, identified as N-31, exhausting through Stack 20.
- (3) One (1) parts washer, capacity: 0.2 gallons per hour, identified as N-32, exhausting through Stack 6.

### Emissions Limitations [326 IAC 2-8-4(1)]

#### D.4.1 Volatile Organic Compounds (VOC)

That pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coatings), the volatile organic compound VOC emissions from the maintenance paint booth (N-26) shall not exceed 3.5 lbs of VOC per gallon of coating less water. Solvent sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.4.2 Particulate Matter Overspray

The maintenance paint booth shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows:  $E = 4.10 P^{0.67}$ , where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour. For process weights in excess of sixty thousand (60,000) pounds per hour,  $E = 55.0P^{0.11} - 40$ .

The preventive maintenance plan shall be moved from the Compliance Monitoring Section to the Emission Limitations Section as Condition D.4.3.

#### D.4.63 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, ~~is~~ **shall be** required for these facilities.

To update Section D.4, a Compliance Determination section shall be added.

### Compliance Determination Requirements:

The particulate matter overspray control requirements of Condition D.4.3 (now D.4.4), shall be moved from the Compliance Monitoring section to the new Compliance Determination section. The last sentence has been removed because it is not necessary.

#### D.4.34 Particulate Matter Overspray

The dry filters for particulate matter overspray control shall be in operation at all times when the spray booth is in operation. ~~This facility shall comply with 326 IAC 6-3-2(c).~~

No testing requirement was put into the original section D.4 because no testing was required. However, the Office of Air Quality reserves the right to require stack testing if deemed necessary. Thus, the following condition shall be added as Condition D.4.5.

**D.4.5 Testing Requirements [326 IAC 2-1.1-11]**

**The owner or operator is not required to test any emission units under this section at this time. However, IDEM may require compliance testing when deemed necessary to determine if the emission units under this permit are in compliance. If testing is required by IDEM, compliance with the VOC content limits and PM overspray limits specified in Conditions D4.1 and D.4.2, respectively, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.**

**Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]**

The daily visible emission notation requirements of Condition D.4.4 (now Condition D.4.6) shall remain in the Compliance Monitoring section.

**D.4.46 Daily Visible Emission Notations**

Daily Visible Emission Notations of the paint booth stack exhaust, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process, The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

The monitoring requirements of Condition D.4.5 (now Condition D.4.7) shall remain in the Compliance Monitoring section.

**D.4.57 Monitoring**

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To document compliance with Condition D.4.2 observations shall be made daily of the overspray while at least one of the booths is in operation.

Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Record Keeping and Reporting [326 IAC 2-8-4(3)]**

The record keeping requirements of Condition D.4.7 (now Condition D.4.8) shall be amended to reflect the above mentioned changes to the VOC content requirements and to include the record keeping requirements of the daily and weekly PM overspray observations.

**D.4.78 ~~Volatile Organic Compound (VOC) Usage~~Record Keeping Requirements**

~~The Permittee shall maintain records at the source of the materials used that contain any VOCs. The records shall be complete and sufficient to establish compliance with the VOC usage limits and/or records shall be complete and sufficient to establish compliance with the VOC usage limits and/or VOC emission limits established in this permit. The records shall contain a minimum of the following:~~

- ~~a) The weight of VOC containing material used, including purchase orders and invoices necessary to verify the type and amount used;~~
- ~~b) The VOC content (weight percent) of each material used;~~
- ~~c) The weight of VOCs emitted for each compliance period, considering capture and control efficiency, if applicable; and~~

~~Compliance will be determined in accordance with 326 IAC 8-1-2 (Compliance Methods).~~

**To document compliance with the VOC content and PM overspray limits of Conditions D.4.1 and D.4.2 the owner or operator shall:**

- (a) keep and maintain records, on a monthly basis, of the "As Supplied" and "As Applied" VOC data sheets of the five coatings that are determined to have the highest as applied VOC content for that month; and**
- (b) keep and maintain a log of:**
  - (1) the daily visible emission notations required in Condition D.4.6,**
  - (2) the daily and weekly inspections required in Condition D.4.7, and**
  - (3) the additional inspections and observations prescribed by the Preventive Maintenance Plan, as required in Condition D.4.7.**

**All records of paragraphs (a) and (b) shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

Condition D.4.8 (the reporting requirements) shall be removed because this Condition is not a requirement.

~~D.4.8 Reporting  
None required.~~

No changes to the Table of Contents are necessary because the Table of Contents does not list the individual section conditions.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Scott Fulton, at (800) 451-6027, press 0 and ask for Scott Fulton or extension (3-5691), or dial (317) 233-5691.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

SDF

cc: File - Henry County  
U.S. EPA, Region V  
Henry County Health Department  
Air Compliance Section Inspector - Warren Greiling  
Compliance Data Section - Karen Nowak  
Administrative and Development - Janet Mobley  
Technical Support and Modeling - Michele Boner

**FEDERALLY ENFORCEABLE STATE  
OPERATING PERMIT (FESOP)  
OFFICE OF AIR QUALITY**

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
Phone: 1-800-451-6027

**DaimlerChrysler Corporation New Castle Machining & Forge Plant  
1817 "I" Avenue  
New Castle, Indiana 47362**

DaimlerChrysler Corporation New Castle Machining & Forge Plant is hereby authorized to operate subject to the conditions contained herein, the facilities listed in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 and contains the conditions and provisions specified in 326 IAC 2-8 and 40 CFR Part 70.6 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments) and IC 13-15 and IC 13-17 (prior to July 1, 1996, IC 13-1-1-4 and IC 13-7-10).

Operation Permit No.: F 065-5619-00001	Issued: December 12, 1996
First Significant Permit Revision No.: 065-11005-00001	Issued: October 7, 1999
First Administrative Amendment No.: 065-12797-00001	Issued: November 9, 2000
First Minor Permit Modification No.: 065-12960I-00001	Issued: December 8, 2000
Second Minor Permit Modification No. 065-12960-00001	Issued: January 18, 2001
Second Significant Permit Revision No.: 065-13804-00001	Issued June 4, 2001
Second Administrative Amendment No.: 065-14583-00001	Issued: Pending
Third Administrative Amendment No.: 065-14915-00001	Affected Pages: 28 and 29
Issued by: Paul Dubenetzky, Branch Chief, Office of Air Quality	Issuance Date: October 2, 2001

## SECTION D.4 FACILITY OPERATION CONDITIONS

- (1) One (1) maintenance paint booth, capacity: one (1) unit per hour, identified as N-26, exhausting through Stack 102.
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### Emissions Limitations [326 IAC 2-8-4(1)]

#### D.4.1 Volatile Organic Compounds (VOC)

That pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coatings), the volatile organic compound VOC emissions from the maintenance paint booth (N-26) shall not exceed 3.5 lbs of VOC per gallon of coating less water. Solvent sprayed from the application equipment during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

#### D.4.2 Particulate Matter Overspray

The maintenance paint booth shall comply with 326 IAC 6-3-2(c). The 326 IAC 6-3-2 equations are as follows:  $E = 4.10 P^{0.67}$ , where P equals process weight in tons per hour for process weights up to and including sixty thousand (60,000) pounds per hour and E equals the allowable emission rate in pounds per hour. For process weights in excess of sixty thousand (60,000) pounds per hour,  $E = 55.0P^{0.11} - 40$ .

#### D.4.3 Preventive Maintenance [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Condition B.13 of this permit, shall be required for these facilities.

### Compliance Determination Requirements:

#### D.4.4 Particulate Matter Overspray

The dry filters for particulate matter overspray control shall be in operation at all times when the spray booth is in operation.

#### D.4.5 Testing Requirements [326 IAC 2-1.1-11]

The owner or operator is not required to test any emission units under this section at this time. However, IDEM may require compliance testing when deemed necessary to determine if the emission units under this permit are in compliance. If testing is required by IDEM, compliance with the PM overspray limits specified in Condition and D.4.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.



## **Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]**

### **D.4.6 Daily Visible Emission Notations**

Daily Visible Emission Notations of the paint booth stack exhaust, shall be performed during normal daylight operations. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously "normal means those conditions prevailing, or expected to prevail, 80 percent of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one month and has been trained in the appearance and characteristics of normal visible emissions for that specific process, The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an abnormal emission is observed.

### **D.4.7 Monitoring**

Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To document compliance with Condition D.4.2 observations shall be made daily of the overspray while at least one of the booths is in operation.

Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Preventive Maintenance Plan for this unit shall contain troubleshooting contingency and corrective actions for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed.

Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting [326 IAC 2-8-4(3)]**

### **D.4.8 Record Keeping Requirements**

To document compliance with the VOC content and PM overspray limits of Conditions D.4.1 and D.4.2, the owner or operator shall:

- (a) keep and maintain records, on a monthly basis, of the "As Supplied" and "As Applied" VOC data sheets of the five coatings that are determined to have the highest as applied VOC content for that month; and
- (b) keep and maintain a log of:
  - (1) the daily visible emission notations required in Condition D.4.6,
  - (2) the daily and weekly inspections required in Condition D.4.7, and
  - (3) the additional inspections and observations prescribed by the Preventive Maintenance Plan, as required in Condition D.4.7.

All records of paragraphs (a) and (b) shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.